

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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V.W., a minor, by and through his parent :
and natural guardian DERECK WILLIAMS; :
R.C., a minor, by and through his parent and :
natural guardian SANDRA CHAMBERS; :
C.I., a minor, by and through his parent and :
natural guardian VERTELL PENDARVIS; :
M.R., a minor, by and through his parent and :
natural guardian KAREN RAYMOND; :
F.K., a minor, by and through his parent and :
natural guardian KASHINDE :
KABAGWIRA; and J.P., a minor, by and :
through his parent and natural guardian :
ALISSA QUIÑONES; on behalf of :
themselves and all others similarly situated, :

Plaintiffs, :

v. :

EUGENE CONWAY, Onondaga County Sheriff, :
in his official capacity; ESTEBAN GONZALEZ, :
Chief Custody Deputy of the Onondaga County :
Justice Center, in his official capacity; KEVIN M. :
BRISSON, Assistant Chief Custody Deputy, in :
his official capacity; and SYRACUSE CITY :
SCHOOL DISTRICT, :

Defendants. :
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**DECLARATION OF EMILY
NAPIER**

16-CV-1150 (DNH) (DEP)

DECLARATION OF EMILY NAPIER

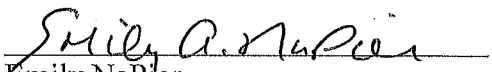
I, Emily NaPier, declare pursuant to 28 U.S.C. § 1746:

1. All facts stated in this declaration are true and correct to the best of my knowledge. I am an adult resident of Onondaga County, and have personal knowledge of the facts contained in this declaration, to which I am competent to testify.

2. I am the Director of Justice Strategies at the Center for Community Alternatives. I am also a member of the Alliance of Communities Transforming Syracuse ("ACTS"), a grassroots, interfaith network advocating for social justice.
3. Juveniles were housed in the Justice Center up until on or about April 2014, at which point they were moved to the Onondaga County Department of Correction's Jamesville Correctional Facility. After the community complained about conditions in Jamesville, county officials moved 16-and 17-year old detainees back to the Justice Center on or about October 2015.
4. I, and others at ACTS, learned that at the Justice Center, 16- and 17-year olds were routinely placed in isolation for disciplinary purposes. In December 2015, I and other ACTS members met with Chief Esteban Gonzalez and the then-Assistant Chief Custody Deputy at the Justice Center and urged them to end the use of solitary confinement for juveniles. In January 2016, ACTS members met with Sheriff Eugene Conway in his office and urged him to do the same. In both meetings, the ACTS members warned the Sheriff's Office that solitary confinement is harmful to a juvenile's brain development and mental health. The Sheriff's Office would not commit to change.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: September 22, 2016
New York, New York


Emily Napier